

Date

Docket Management System
U. S. Department of Transportation
Room Plaza 401
400 Seventh Street, N.W.
Washington, DC 20590-0001

Re: Docket No. FAA 2002-1364

Comments on Improved Seats in Air Carrier Transport Category Airplanes

The Association of Professional Flight Attendants (APFA), representing the 27,000 flight attendants at American Airlines, strongly opposes the inclusion of flight attendant seats in this rulemaking to improve passenger seat safety standards. We take the position that testing particular to flight attendant seats needs to be done to adequately determine the safety of the seats. Flight attendant seats have been treated like passenger seats even though they are different in many aspects. It would be irresponsible for the FAA to blindly move forward based on this assumption.

As stated in the NPRM, “. . . the FAA finds that flight attendants have critical life-saving duties to perform following an emergency landing . . .” Further, it states, “. . . flight attendants must assist passengers with emergency egress through emergency exits to safety outside the airplane.” We are pleased that the FAA acknowledges the importance of flight attendants’ roles in emergency situations and whole-heartedly agree that flight attendant seats should meet the 16g standard.

The seat testing used in this NPRM was done on forward facing passenger seats, not flight attendant seats. Many flight attendant seats are aft-facing, in addition to forward-facing and there is no data concerning these seats. In addition, flight attendant seats are not track-mounted – passenger seats are. Again we stress the difference in the two types of seats. In addition, the harness assembly is different on a flight attendant seat than on a passenger seat. They will consequently they have different impact points.

Pilot’s seats are excluded from this NPRM because “The FAA is unable to conclude that upgrading the survivability aspect of flight deck seats would result in a significant, overall improvement in safety.” The same cannot be said about flight attendant seats. The critical life-saving duties of flight attendants call for a separate study focused entirely on improved seat safety standards for flight attendant seats. Anything less seems unreasonable and indefensible.

Contact Joann Matley, APFA National Safety Coordinator, at 800-395-2732 Ext. 8302 with questions or comments.